

NANCY WINPIGLER SHOEMAKER,	*	NO. 28407 EQUITY
aka Nancy Winpigner	*	
A-101 Waverley Apartments	*	IN THE
Frederick, Maryland 21701,	*	CIRCUIT COURT
PLAINTIFF		
VS	*	FOR
CHARLES MELVIN SHOEMAKER	*	FREDERICK COUNTY,
Route 2, Box 10-D	*	
Middletown, Maryland 21769,	*	MARYLAND.
DEFENDANT		
* * * * *		

BILL FOR PARTITION AND SALE OF REAL ESTATE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Nancy Winpigner Shoemaker, aka Nancy Winpigner, Plaintiff, by Franklin D. Stillrich, her solicitor, respectfully submits to your Honors as follows:

FIRST: That the Plaintiff, Nancy Winpigner Shoemaker, aka Nancy Winpigner, and the Defendant, Charles Melvin Shoemaker, are unmarried to each other.

SECOND: That the Plaintiff, Nancy Winpigner Shoemaker, and Charles Melvin Shoemaker, are the owners in fee simple, as tenants in common, of all that described real estate situate, lying and being in Middletown Election District and described as Lot No. 2 on a Plat of "Deer Spring Farms, Section 3" prepared by S. T. Nottingham, registered land surveyor, dated September 9, 1971 and recorded in Plat Book 7, folio 61, one of the Plat Records of Frederick County, Maryland, said real estate being further described in a Deed dated April 15, 1975 by Deer Spring Farms, Inc. to Charles Melvin Shoemaker and Nancy Winpigner Shoemaker and recorded in Liber 958, folio 884, one of the Land Records of Frederick County; a copy of said Deed is attached hereto, marked "Exhibit A", and prayed to be taken as a part hereof.

THIRD: That the Plaintiffs, Nancy Winpigner Shoemaker and Charles Melvin Shoemaker, are also the owners as tenants in common, of Lot 18, Section 2, Deer Spring Farms, which plat is recorded in Plat Book 7, folio 61, one of the Plat Records of Frederick County, by deed dated April 18, 1973 and recorded in Liber 930, folio 889; a copy of said Deed is attached hereto, marked "Exhibit B" and prayed to be made a part hereof.

FOURTH: That the aforesaid properties are encumbered by a mortgage in the principal sum of \$32,500.00 from Charles Melvin Shoemaker and Nancy Winpigner Shoemaker, to First Federal Savings and Loan Association of Hagerstown, dated June 25, 1976 and recorded among the Land Records of Frederick County, Maryland.